

Postal Service 3/23/2005 08:57 PAGE 001/001

Judge Copy

Enroute Samuel Pade  
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Date: 03/23/2005

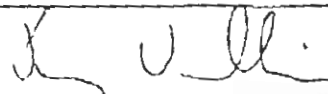
Fax Transmission  
Fax Number:

Dear:

The following is in response to your 03/23/2005 request for delivery information on your Certified item number 7001 0320 0002 0750 5291. The delivery record shows that this item was delivered on 12/10/2004 at 09:44 AM in WILMINGTON, DE 19801. The scanned image of the recipient information is provided below.

Signature of Recipient:

Delivery Section

  
Kory Vincent

Address of Recipient:

820 North French St  
Wilmington DE 19801

Thank you for selecting the Postal Service for your mailing needs. If you require additional assistance, please contact your local Post Office or postal representative.

Sincerely

United States Postal Service

Samuel T. Poole BN559999-635-JJFStan Taylor Raphael WilliamsJoseph J. FarnanMotion To order, For Counsel

The ability of the indigent to present his claims because with no legal training, See *Whitner v. Team* 739 F.2d 140, 143 (4<sup>th</sup> Cir 1984) and I am confined to a prison across the state line with very limited access to legal materials. *Rayos v. Johnson*, 969 F.2d 200, 703-04 (8<sup>th</sup> Cir 1992) The plaintiff's ability to investigate the facts. *Tucker v. Randall*, 948 F.2d 388, 392 (7<sup>th</sup> Cir 1991); *Gatson v. F.R.D.* 96, 105 (F.D. Wis., 1984) in ~~add~~ addition cover up connected to the other parties such as the Attorney Gen. aware of the problems - play a blind eye of equal protection overcrowding Misuse of State and Federal Funded Money to house unsentenced inmates on the floor inside of Gander Hill and while, Defendant Stan Taylor and Raphael Williams Placing inmates injured bleeding back on the floor July 6, 1999 and total of 180 days being on the floor the Merit of the case will be successful. *Dyson v. Kocik*, 689 F.2d 466, 467-68 (3<sup>rd</sup> Cir 1982) citing *Jury Demanded as a Factor supporting appointment of Counsel*, 122 S. Ct. 1995, 1992,

42 U.S.C. § 1981: Racial Discrimination Claims - Patterson  
 V. McLean Credit Union, 491 U.S. 164, 172, 109 S. Ct  
 2563 (1989) 42 U.S.C. § 1985 (3) Direct Participation  
 Stan Taylor run all prisons in the State and the Warden  
 Rapel Williams is aware of every thing that happen  
 in Prisoner Bill but Failure to act but continue  
 with a blindeye Alexander V. Perrell, 916 F.2d 1392,  
 1395 (9<sup>th</sup> Cir. 1990).

Service of 58-59, Affidavit, Mem, Order for Counsel has  
 been serve upon defendant's counsel for the foregoing  
 reasons, the court should grant the plaintiff Motion for  
 appointment to Counsel in this case.

This will be serve certified also.

Respectfully Submitted  
 Thank you

3-31-05

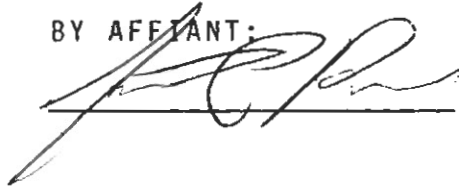
Samuel T. Poole  
 PO Box 1000  
 Houtedale PA  
 16698-1000

AFFIDAVIT AND PROOF OF SERVICE

NOW COMES, Samuel T. Poole AND AFIRMS THAT HE IS THE LITIGANT IN THE AFORE CAPTIONED AND ATTACHED MATTER, THAT THE WITHIN AVERMENTS AND FACTS IN SUPPORT THEREFORE ARE TRUE AND CORRECT TO THE BEST OF HIS PERSONAL EXPERIENCE, RECALL, KNOWLEDGE AND BELIEF, UNDER PENALTY FOR PERJURY. HE FURTHER AFFIRMS AND AVERS THAT HE HAS SERVED COPIES OF THE FOREGOING AND ATTACHED DOCUMENTS BY FIRST-CLASS MAIL TO THE PARTIES LISTED BELOW, BY HAVING PLACED THEM IN THE HANDS OF PRISON AUTHORITIES FOR MAILING, AS RULED PROPERLY AND TIMELY "FILED" BY AND IN HOUSTON vs LACK, 108 s. ct 2379, at 2383 (1988).

I CERTIFY THAT THIS DOCUMENT WAS GIVEN TO PRISON OFFICIALS, FOR THE FORWARDING TO THE SAID COURT. I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT. 28 U.S.C. SEC. 1746.

BY AFFIANT:



CC:

SUBSCRIBED AND SWORN TO ME

THIS 3 DAY OF 30, 2025

Richard Hubbard  
820 North Serech St  
Wilmer, DE  
19801

Certified

NAME Seantel T. Hodge  
NUMBER 13M15399  
P.O. BOX 1000  
HOUTZDALE PA 16698-1000

U.S.M.S.  
X-RAY

Inmate Mail  
PA Department of Corrections

PA Dept of Corrections  
Inmate Mail



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19801-3519

19801+3519 12

